

### OPTIONAL DETERMINATION OF NON-SIGNIFICANCE (DNS) NOTICE MATERIALS

The attached materials are being sent to you pursuant to the requirements for the Optional DNS Process (WAC 197-11-355). A DNS on the attached proposal is likely. This may be the only opportunity to comment on environmental impacts of the proposal. Mitigation measures from standard codes will apply. Project review may require mitigation regardless of whether an EIS is prepared. A copy of the subsequent threshold determination for this proposal may be obtained upon request.

request.	
File No.	21-106968-LD
Project Name/Address:	Bellevue 600 Phase 2/600 108th Avenue NE
Planner:	Laurie Tyler
Phone Number:	(425)-452-2728
Minimum Comment Period:	May 27, 2021, 5PM
willing Comment renou.	
Materials included in this Notice:	

# **SEPA** Environmental Checklist

#### Purpose of checklist:

The City of Bellevue uses this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

#### Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies and reports. Please make complete and accurate answers to these questions to the best of your ability in order to avoid delays.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The City may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

PLEASE REMEMBER TO SIGN THE CHECKLIST. Electronic signatures are also acceptable.

# A. Background [help]

1. Name of proposed project, if applicable: [help]

Bellevue 600 - Phase 2

2. Name of applicant: [help]

Acorn Development LLC

3. Address and phone number of applicant and contact person: [help]

Ben Spicer Associate/Designer NBBJ 206-223-5555

4. Date checklist prepared: [help]

April 2, 2021

5. Agency requesting checklist: [help]

City of Bellevue Development Services Department

6. Proposed timing or schedule (including phasing, if applicable): [help]

The Bellevue 600 project was planned to be developed in two phases through the submittal of a Master Development Plan (MDP). Phase 1, which has been approved and is currently under construction, is redeveloping the east portion of the site and Phase 2 would redevelop the west portion of the site. An MDP application has been submitted for the entire site, as well as separate Administrative Design Review applications (ADRs) for Phase 1 and Phase 2 of the project. Construction of Phase 2 is anticipated to begin in 2022, with building occupancy by 2025.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [help]

No plans for future additions or expansions are known or anticipated. Please see Appendix A for a complete list of anticipated permits.

- 8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [help]
  - Master Development Plan (MDP)/Administrative Design Review (ADR) Geotechnical Engineering Services, Geoengineers, 2019;
  - Phase 2 Administrative Design Review Geotechnical Engineering

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Services, Geoengineers, 2021

- Phase I Environmental Site Assessment, Aspect, March 2019;
- Trip Generation Summary/Request for Traffic Modeling Bellevue 600 Phase 2, TENW
- GHG Emissions Worksheets for Phase 2, EA, 2021
- Arborist's Report, Tree Solutions, December 2019.
- 9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. [help]

There are no known applications pending for approval that would directly affect property associated with the proposed action.

10. List any government approvals or permits that will be needed for your proposal, if known. [help]

Please see Appendix A for a complete list of anticipated permits.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.) [help]

The Bellevue 600 project is a new office and retail development located in downtown Bellevue, directly north of and adjacent to the Bellevue Transit Center. The proposed project is planned to be developed in two phases: Phase 1 is currently under construction on the east portion of the project site, and Phase 2 would redevelop the west portion of the site. Phase 2 will include demolition of the existing 600-108<sup>th</sup> Avenue NE building (Bellevue Corporate Plaza) and replacing it with a 31-story office tower. Additionally, Phase 2 will tie into the below grade structure completed during Phase 1. The project site is located in the Eastside Center District in Downtown Bellevue.

Phase 2 of the project features a new office tower and retail uses at the northeast corner of 108th Avenue NE and NE 6th Street. The development site is approximately 57,822 SF of the total site area of 155,906 SF (including Phase 1) and will also provide pedestrian connections to the north and west. Similar to Phase 1, the new Phase 2 building steps back from the Grand Connection along NE 6th Street, and the streetscape along both 108th Avenue NE and the NE 6th Street Pedestrian Corridor will be enlivened by retail and other active uses.

A 6-level below-grade parking garage will contain approximately 1,739 stalls - of which 741 stalls will be provided during Phase 2. Parking for approximately 475 bicycles in Phase 2 would also

be provided. Vehicle access for parking, loading, and service is consolidated on the north side of the site via a private access roadway connecting  $110^{\rm th}$  Avenue NE to  $108^{\rm th}$  Avenue NE.

The proposed project is seeking an administrative departure from LUC: 20.25A.020.A.DT-Overhang into Build-to Line. The applicant is considering voluntarily granting the City's request for a wider sidewalk easement along 108th Ave NE. This easement would provide a significant public benefit by more ROW space on 108th Ave NE, including City plans for a new bus platform on the west side of 108th Ave NE separated from the southbound bike lane, to improve transportation mobility and pedestrian and bike rider in downtown Bellevue. However, the easement also requires that the entire façade of the building must be set back 8-feet from the prior build-to line along 108th Ave NE. Granting this departure would allow an overhang up to 4-feet beyond the new build-to line so that the project can still meet the required program size for the Meeting Center while providing an enhancement of the public realm and granting the City's requested easement.

The proposed project is also seeking an administrative departure from LUC 20.25A.090: Active Use at Street Level. This departure seeks to reduce the Active Use requirement along NE 6th Street (Class A Street) from 100% to 86%. This would permit the Phase 2 main building entry to be located along the Pedestrian Corridor, allowing both Phase 1 and Phase 2 entries to be perceived as part of a unified landscaped open space at the southern end of the outdoor plaza and the north/south pedestrian connector. It also enables the main Phase 2 entry to be across the street from the Bellevue Transit Center and near the new light rail station to the east, permitting office employees easy access to public transportation.

The proposed project is also seeking an administrative departure from LUC 20.25A.090 Plate A.1, which requires tree pits on 108th Ave NE between NE 4th St and NE 8th St. This departure seeks to replace the individual 5'-0" tree pits on the east side of 108th Ave NE between NE 6th St and NE 7th St. The tree pits will be replaced with a series of 5' wide landscaped planting strips with street located east of the northbound bike lane in the 24' sidewalk ROW. Granting this departure request increases pedestrian and bike rider safety by reducing opportunities for pedestrians from crossing the 5' wide planting strips directly into on-coming traffic in the northbound bike lane.

And lastly, the proposed project is also seeking an administrative departure from LUC: 20.25A.020.A.DT-Build-to Line. This departure requests to set the building façade at

street level back from the build-to line along 108th Ave NE and NE 6th St. Granting this departure will enhance the pedestrian experience by providing a wider sidewalk on 108th Ave NE, allow for a triangular building setback at the intersection of 108th and NE 6th and highlighting the importance of the Phase 2 main entry on the Pedestrian Corridor.

Total gross square footage (per City of Bellevue LUC Chapter 20.50 code definition) for the project is approximately 1,980,443 gross square feet, with a chargeable FAR of 1,503,141 square feet. Gross square footage associated with Phase 2 equals approximately 815,586 gross sq. ft. with approximately 626,872 sq. ft. of chargeable FAR.

See Figures 1-5 in Appendix A.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. [help]

The Bellevue 600 Development would be located on the south portion of a block that is bound by NE  $8^{\rm th}$  Street to the north,  $110^{\rm th}$  Avenue NE to the east, NE  $6^{\rm th}$  Street to the south and  $108^{\rm th}$  Avenue NE to the west. Please refer to the plans on file with the City of Bellevue for a legal description of the project site. Please see Figures 1-5 in Appendix A for a vicinity map and site plan for the project.

# B. Environmental Elements [help]

#### 1. Earth [help]

- a. General description of the site: [help] (select one):  $\square$ Flat,  $\square$ rolling,  $\square$ hilly,  $\square$ steep slopes,  $\square$ mountainous, other: Refer to 1.b below for qualification of flat.
- b. What is the steepest slope on the site (approximate percent slope)? [help]

Site grades generally slope down from northwest to southeast from approximately Elevation 179 feet along the western project boundary (Phase 2) to Elevation 167 feet in the southeast corner of the project site (Phase 1).

The steepest slope in the ROW is approximately 5%. There are slopes on site up to 33% with a maximum vertical drop of 5 feet.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [help]

A Geotechnical Engineering Services Report (Geoengineers, 2021) completed for this project, which is on file with the City of Bellevue, identified on-site soil conditions by conducting soil borings at various locations onsite.

Asphalt pavement and crushed rock base course were encountered at the ground surface in each of the borings. The asphalt thickness ranged from 1 to 4 inches. The base course thickness ranged from 1 to 4 inches.

The soils encountered at the site consist of fill or weathered native soils overlying competent glacially consolidated soils. Fill, where present, is interpreted to be associated with construction of existing improvements at the site. The fill generally consists of very loose to medium dense sand with variable silt and gravel content. The weathered native soils generally consist of loose to medium dense silty sand with variable gravel. The fill/weathered native soil layer thickness is anticipated to be less than 5 to 10 feet across the project site.

Glacially consolidated soils were encountered below the fill and weathered native soils, where present. Three glacially consolidated units were encountered in the explorations: till-like deposits, cohesionless sand and gravel, and cohesive silt and clay.

- Till-like deposits were encountered below the fill and weathered native soils, where present, and generally consist of dense to very dense silty sand with gravel and very stiff to hard silt with variable sand and gravel content. The thickness of the till-like deposits ranges up to approximately 40 feet thick.
- A layer of cohesive silt and clay was encountered locally below the till-like deposits and generally consists of very stiff to hard silt and clay with variable sand content, with several interbedded layers/lenses of sand with variable silt content. This layer of cohesive silt and clay was observed to be approximately 5 feet thick in the northeastern portion of the site and range up to approximately 20 feet thick in the southwestern portion of the site.

- Cohesionless sand and gravel was encountered below the till-like deposits and the cohesive silt and clay deposits, where present, and generally consists of dense to very dense sand and gravel with variable silt and cobble content. The cohesionless sand and gravel unit ranges up to approximately 45 feet thick.
- Cohesive silt and clay was encountered below the cohesionless sand and gravel and generally consists of very stiff to hard silt and clay with variable sand content, with several interbedded layers/lenses of sand with variable silt and gravel content.

While not encountered in the borings, boulders are frequently encountered in glacially consolidated soils and may be present at the site.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [help]

No. Groundwater levels at the site are generally within the dense/very stiff to very dense/hard glacially consolidated soils, which indicates a low risk of liquefying because of the density and gradation of these soils.

There are no known mapped faults beneath the site; therefore, the potential for surface rupture at the site is considered low. As well, due to the location of the site and the site's topography the risk of seismically induced slope instability, differential settlement, surface displacement due to faulting, or lateral spreading is considered to be low.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. [help]

Approximately 256,000 bank cubic yards of excavation would be required for Phase 2 of the project. Minimal fill would be necessary, and would be expected to be sourced locally, if needed.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. <a href="[help]">[help]</a>

Erosion is possible as a result of any construction activity. Site work would expose soils, but implementation of a Temporary Erosion and Sedimentation Control (TESC) plan incorporating best management practices (BMPs) would mitigate potential impacts. Once the building is operational, no erosion would be anticipated.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [help]

Approximately 95 percent of the Phase 2 project site is covered with impervous surfaces under existing conditions. Following construction, roughly 91 percent of the Phase 2 project site would be covered with impervious surfaces.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [help]

No significant adverse earth-related impacts are anticipated. Comprehensive Drainage Control Plan approvals (including construction BMPs and soil stabilization) would be submitted as an element of the Clear & Grade permit plan set.

#### 2. Air [help]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. [help]

Construction dust mitigation measures per Clear & Grade Code BCC 23.76 Phase 2 of the proposed project could result in localized increases in air quality emissions (primarily carbon monoxide) due to construction vehicles, equipment and activities. Dust would also result during construction activities. Emissions, however, would not result in exceedance of ambient air quality standards.

Phase 2 of the project has been designed to conform to applicable regulations and standards of agencies regulating air quality in Bellevue. These include the Environmental Protection Agency (EPA), Washington State Department of Ecology (DOE), and the Puget Sound Clean Air Agency (PSCAA).

Phase 2 of the proposed project is not expected to result in violations of ambient air quality during construction or operation.

In order to evaluate the climate change impacts of Phase 2, a King County Greenhouse Gas Emissions Worksheet has been prepared to estimate the emissions footprint for the lifecycle of the project on a gross-level basis (see Appendix B). The emissions estimates are based on the combined emissions from the following sources:

- Embodied Emissions - extraction, processing, transportation construction and disposal of materials and landscape disturbance;

- Energy-related Emissions energy demands created by the development after it is completed; and,
- Transportation-related Emissions transportation demands created by the development after it is completed.

The worksheet estimates are based on building use and size. In total, the estimated lifespan emissions estimate for Phase 2 of the Bellevue 600 project is approximately 1,101,654 MTCO2e.

The worksheet used to estimate Phase 2 project emissions is contained in Appendix B of this Checklist. This emissions estimate does not take into account any sustainability measures that would be incorporated into the project - please see Section 6.c. of this Environmental Checklist for more information.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [help]

There are no offsite sources of air quality emissions or odors that may affect the proposed project.

c. Proposed measures to reduce or control emissions or other impacts to air, if any: [help]

No significant adverse emissions or air quality-related impacts are anticipated during construction or operation of the proposed project.

The following measures could be implemented to further control emissions and/or dust during construction:

-Use of well-maintained equipment would reduce emissions from construction equipment and construction-related trucks, as would avoiding prolonged periods of vehicle idling.

-Use of electrically operated small tools in place of gas powered small tools, wherever feasible.

-Trucking building materials to and from the project site would be scheduled and coordinated to minimize congestion during peak travel times associated with adjacent roadways.
-Demolition dust would be handled in accordance with PSCAA regulations and sprinkling during demolition.

Please see Section 6.c. of this Environmental Checklist for more information on project design elements that address sustainability for the proposed project.

#### 3. Water [help]

#### a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. [help]

The nearest surface water bodies are Lake Bellevue, which is located approximately 0.5 miles northeast of the project site and Lake Washington, which is located approximately 0.75 mile west of the site.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. [help]

No. The project will not require any work over, in, or adjacent (within 200 feet) to any water body.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. [help]

No fill or dredge material would be placed in or removed from any surface water body as a result of the proposed project.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [help]

No. The proposed project would not require any surface water withdrawals or diversions.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [help]

No. The proposed project does not lie within a 100-year floodplain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. [help]

No. There would be no discharge of waste materials to surface waters.

#### b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities

Project is subject to Utility Code BCC 24.06 and any required utility permits.

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withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. [help]

A Geotechnical Engineering Services Report (Geoengineers, 2021) completed for this project, which is on file with the City of Bellevue, identified groundwater conditions on site. Groundwater was measured at depths ranging from 96 to 121 feet bgs in monitoring wells at the project site.

No groundwater would be withdrawn from a well and no water would be discharged to groundwater.

The lowest finished floor elevation is anticipated to be located above the regional groundwater table in the site vicinity. However, perched groundwater seepage was observed in the borings and should be anticipated at the site. Temporary dewatering by means of local sumps and pumps within the excavation is anticipated to be sufficient to remove perched groundwater seepage during excavation and construction of the building foundations and underground parking garages. Dewatering of groundwater would be discharged to the stormwater or sanitary sewer systems in accordance with local and state regulations.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. [help]

Waste material will not be discharged into the ground from septic tanks or other sources. The proposed buildings would connect to the City's sewer system and would discharge directly to that sewer system.

- c. Water runoff (including stormwater):
  - 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. [help]

Existing and new impervious surfaces constructed on the site are and would continue to be the source of runoff from the proposed project.

Overall, stormwater will be collected using catch basins and closed pipes and routed to a flow control facility before being discharged to the public storm system. The runoff that touches pollution-generating surfaces (roads

and parking) will be treated for water quality before being routed to flow control.

The Bellevue 600 Phase 2 project will discharge into two separate basins. The western portion of the site from back of sidewalk and approximately the northern third of the building roof will discharge west into the Meydenbauer Creek basin, allowing the same area to discharge to the basin as current flows there today. The remainder of the project site will be routed to the stormwater detention vault installed in Phase 1. Pollution generating impervious surfaces will require stormwater quality treatment, so treatment units will be installed along 108th Ave NE. The Phase 2 portion of the new NE 7th Street roadway will be routed to a water quality unit within the below grade parking garage installed during Phase 1. The project will implement green roof and soil cells on site to provide natural flow attenuation and water quality treatment, and promote evapotranspiration.

2) Could waste materials enter ground or surface waters? If so, generally describe. [help]

No. The proposed stormwater collection system and the TESC and BMPs implemented during construction would prevent waste materials from entering ground or surface waters.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. [help]

No. The proposal would not alter or otherwise affect drainage patterns in the vicinity of the site. Stormwater on the site is currently collected and conveyed to the City's storm drainage system and the proposed system will continue the same drainage patterns.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: <a href="[help]">[help]</a>

No significant adverse surface, ground, runoff water or drainage pattern impacts are anticipated.

Stormwater from new impervious surfaces would be managed per the 2017 City of Bellevue Storm and Surface Water Engineering Standards.

-Flow control will be provided to minimize the impact of impervious surfaces;

-Water quality treatment will be provided to minimize pollutants entering surface and ground water;

-Low impact development will be evaluated and implemented

to the maximum extent feasible to simulate predeveloped conditions.

#### 4. Plants [help]

a. Check the types of vegetation found on the site: <a href="[help]">[help]</a> <a href="Modeciduous tree">Modeciduous tree</a>: alder, maple, aspen, other: other

⊠evergreen tree: fir, cedar, pine, other: other

⊠shrubs

□grass

□pasture

□crop or grain

□Orchards, vineyards or other permanent crops.

 $\square$  wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other: Click here to enter text.

Dwater plants: water lily, eelgrass, milfoil, other: Click here to enter text.

 $\square$  other types of vegetation: Click here to enter text.

#### b. What kind and amount of vegetation will be removed or altered? [help]

An arborist's report (Tree Solutions, 2019) has been prepared for this project to identify and evaluate existing on-site trees, as well as those adjacent to the project site (see Appendix C).

The existing landscape contains primarily trees. Along the western property line on the Phase 2 site and planted within tree grates in the sidewalk are Japanese zelkova. There are also several trees in a central courtyard, which include Douglas-fir, Japanese maple, and western hemlock.

Directly to the south of the property, within the adjacent ROW and pedestrian corridor, are littleleaf linden trees, which are also planted in tree grates in the sidewalk.

Existing street trees, as well as existing on-site trees and vegetation would be removed as a result of construction activities associated with the proposed project, however, there will be significantly more trees planted on site as part of the project's landscaping design than will be removed.

#### c. List threatened and endangered species known to be on or near the site. [help]

No known threatened or endangered species are located on or proximate to the project site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [help]

Phase 2 of the proposed project would plant 16 street trees, as well as native and drought-tolerant shrubs and groundcovers on the project site. Approximately 6,688 sf of street level open space would be provided for the Phase 2 portion of the outdoor plaza.

The proposed landscape for these areas is designed to maximize the site's potential for native habitat for insects and pollinators as well as slow and filter water. Using the native plants that are most adapted to these roles will support the ecological health of the site and its down-stream impacts while also helping downtown residents with less typical plants in an urban setting. The design will continue to refine species to fit appropriate solar access, soil makeup, and water. The design also acknowledges the evolution of the site overtime and looks to build up healthy soil and connection among species to ensure benefit throughout the year over time.

The proposed street trees that will be planted will conform to the City of Bellevue's tree plan; species options include sweetgum, Japanese zelkova, katsura tree, and ginkgo.

e. List all noxious weeds and invasive species known to be on or near the site. [help]

Noxious weeds that are known to be present in King County include giant hogweed (heracleum mantegazzianum) and English ivy. The site is located in an urban, developed area and no known noxious weeds or invasive species are known to be on or near the site.

#### 5. Animals [help]

Examples include:

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. [help]

birds: $\Box$ hawk, $\Box$ heron, $\Box$ eagle, $\boxtimes$ songbirds, other: $seagul1s$ ,	pigeons
mammals: $\square$ deer, $\square$ bear, $\square$ elk, $\square$ beaver, other: $squirrels$	
fish: $\square$ bass, $\square$ salmon, $\square$ trout, $\square$ herring, $\square$ shellfish, other: $N$ one	

b. List any threatened and endangered species known to be on or near the site. [help]

The project site is located in an urban, developed area and no threatened or endangered species are known to be on or near the site.

c. Is the site part of a migration route? If so, explain. [help]

Yes. The entire Puget Sound area is within the Pacific Flyway, which is a major north-south flyway for migratory birds in America, extending from Alaska to Patagonia, a region at the southern end of South America. Every year, migratory birds travel some or all of this distance both in spring and in fall, following food sources heading to breeding grounds, or travelling to overwintering sites.

d. Proposed measures to preserve or enhance wildlife, if any: [help]

The proposed project would provide on-site landscaping, which could provide limited habitat for urban wildlife.

Additionally, the project is evaluating adoption of Salmon Safe Standards that focus on minimizing the impacts of development on sensitive aquatic and upland resources and enhancing salmon habitat. These standards emphasize landscape-level conservation and protection of biological diversity.

e. List any invasive animal species known to be on or near the site. [help]

Invasive species known to be located in King County include European starling, house sparrow and eastern gray squirrel.

#### 6. Energy and Natural Resources [help]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. [help]

Electricity is the primary source of energy that would serve the proposed development. During operation, electricity would be used for project heating, cooling, hot water, cooking and lighting.

b. Would your project affect the potential use of solar energy by adjacent properties?
 If so, generally describe. <a href="[help]">[help]</a>

While some shadow impacts to nearby private properties are anticipated to result from construction of the tower on the project site, impacts are not expected to be significant.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: [help]

The proposed project will achieve a LEED Gold rating or better, and all building systems would conform to or exceed the current Bellevue Energy Code.

Additionally, the following project design elements are proposed to reduce energy use, increase sustainable building design, and reduce GHG emissions. Key measures that are proposed include:

-The project will provide alternative commuting opportunities, including parking provisions for bicycles, and showers and locker rooms for bike commuters.

-High performance glazing to be installed on the office tower will include double low-E coatings, reducing both heat gain and loss throughout the year.

-Reflective roof surface treatment to reduce the 'heat island effect.'

-Drought resistant and tolerant plants could be planted in landscaped areas to minimize irrigation requirements.

-Maximize use of outside air for heating, ventilating, and air conditioning.

-Efficient light fixtures will be on occupancy and daylight sensors as well as nighttime sweep controls.

-Low flow plumbing fixtures could result in a 30% reduction of water consumption.

-Low VOC emitting materials could be used for finishes, adhesives primers and sealants.

-Recycled content and rapidly renewable materials used would include concrete, steel and fibrous materials (bamboo, straw, jute, etc).

-Construction waste management will include salvaging demolished material and construction waste for recycling.

-The project will be all-electric (no natural gas) to help reduce carbon emissions that contribute to climate change.

-The garage structure will be steel to reduce the amount of embedded carbon.

-The project will achieve enhanced water savings by using a greywater system.

#### 7. Environmental Health [help]

Are there any environmental health hazards, including exposure to toxic chemicals, risk
of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?
If so, describe. [help]

The completed project would have no known environmental health hazards that could occur as a result of this proposal.

1) Describe any known or possible contamination at the site from present or past uses. [help]

A Phase I Environmental Site Assessment (ESA) Report (Aspect Consulting, 2019) was completed for this project, and is on file with the City of Bellevue. The Phase I ESA identified one recognized environmental condition (REC) for the Bellevue 600 project site:

1. Historical BB Cleaners site located approximately 160 feet to the southwest of the project site - No releases or violations were indicated for this former dry cleaners site; however, because this site is located within 200 feet of the Bellevue 600 site, soil gas under the Bellevue 600 project site was evaluated to assess the potential for vapor intrusion from this former dry cleaners site.

Results from this evaluation of the potential for vapor intrusion impacts from this former dry cleaners site indicated that no further soil and/or groundwater sampling was warranted related to environmental due diligence and occupancy of the existing buildings.

Focused soil and groundwater sampling and laboratory analysis was conducted at the Bellevue 600 project site as part of preconstruction planning. The sampling and analysis was focused to provide analytical data for the characterization of soil and water to guide the handling and disposal of soil and water generated during excavation for project construction. The results of the sampling found no evidence of property-wide contamination requiring cleanup; however, two locations were identified in the Phase 2 portion of the project site where the shallow fill soil contained heavy oil-range petroleum hydrocarbons and carcinogenic polycyclic aromatic hydrocarbon (cPAHs) at concentrations greater than the Ecology Model Toxics Control Act Method A cleanup levels for unrestricted land use. The results indicate that localized areas of the shallow fill soil placed over native soil at the property as part of previous construction activities contain concentrations of petroleum hydrocarbon-related chemicals, which is consistent with fill soil placed in urban areas throughout the Puget Sound region. The soil and water generated during excavation for project construction will be handled and disposed, in accordance with applicable regulations, as outlined in the Bellevue 600 Environmental Construction Contingency Plan (ECCP) discussed in Section

7.a.5.below.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. [help]

None are known.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. <a href="[help]">[help]</a>

No toxic or hazardous chemicals are anticipated to be stored, used, or produced during the project's development, construction, or operation.

4) Describe special emergency services that might be required. [help]

No special emergency services are anticipated to be required as a result of the project. As is typical of urban development, it is possible that normal fire, medical, and other emergency services may, on occasion, be needed from the City of Bellevue.

5) Proposed measures to reduce or control environmental health hazards, if any: [help]

An Environmental Construction Contingency Plan (ECCP) will be prepared to guide the handling and disposal of soil and water generated during construction excavation activities, in accordance with applicable regulations. The ECCP will also provide recommendations to guide the response to any undocumented environmental conditions of potential concern discovered during construction activities.

#### b. Noise [help]

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [help]

Traffic noise associated with adjacent streets and the Bellevue Transit Center is relatively high at certain times of day. Traffic noise is not expected to adversely affect the proposed project.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indi-cate what hours noise would come from the site. [help]

Construction-related noise would occur as a result of onsite construction activities associated with the project. Construction noise would be short-term and would be the most noticeable noise generated. The proposed project would comply with provisions of Bellevue City Code - Chapter 9.18 Noise Control.

3) Proposed measures to reduce or control noise impacts, if any: [help]

As noted, the project would comply with provisions of the City's Noise Controls or would obtain a noise variance.

#### 8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. <a href="[help]">[help]</a>

The Phase 2 project site currently contains the 10-story Bellevue Corporate Plaza office building with associated surface parking.

Surrounding adjacent land uses include several mid- to high-rise office and residential buildings with retail uses at street level, the Bellevue Transit Center, which is located directly south of the Pedestrian Corridor, and the Meydenbauer Center located across 110<sup>th</sup> Avenue NE to the east. Directly to the south of the site is the Bellevue Pedestrian Corridor, and to the north are several surface parking lots.

Phase 2 of the proposed project would result in an increase in on-site population associated with the proposed office and retail uses, which would result in increased activity levels on-site and within the immediate surrounding neighborhood.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? <a href="[help]">[help]</a>

No. There is no evidence that the site has been used for agriculture in the past 50 years.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: <a href="[help]">[help]</a>

No. The proposal will not affect or be affected by working farm or forest land.

c. Describe any structures on the site. [help]

The Phase 2 project site currently contains the 10-story Bellevue Corporate Plaza office building with associated surface parking, which is planned to be removed as part of redevelopment of the proposed project. See Figure 2 in Appendix A for more information.

d. Will any structures be demolished? If so, what? [help]

All existing structures on the site - the Bellevue Corporate Plaza building and associated surface parking are proposed to be demolished prior to excavation for Phase 2.

e. What is the current zoning classification of the site? [help]

The overall project site is zoned Downtown Office - 1 (DT-O1).

f. What is the current comprehensive plan designation of the site? [help]

The overall project site is located within the Downtown Neighborhood Area (subarea).

g. If applicable, what is the current shoreline master program designation of the site? [help]

The project site is not located within the City's designated shoreline boundary.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [help]

No part of the site has been classified as a critical area by the City of Bellevue or King County.

i. Approximately how many people would reside or work in the completed project? [help]

Employee estimates are based on the 2014 King County Buildable Lands Report, which assumes approximately 300 to 400 sq. ft. per employee in the Bellevue Urban Center.

Overall, Phase 2 of the proposed project could employ approximately 2,039 to 2,719 people in the office/retail buildings, although the occupancy allowed by the building code is higher.

j. Approximately how many people would the completed project displace? [help]

The completed project would not displace any people. No impacts would occur as existing tenant leases in the Bellevue

Corporate Plaza building will have expired by start of construction of Phase 2.

k. Proposed measures to avoid or reduce displacement impacts, if any: [help]

No impacts would occur and no measures are proposed. Phase 2 will only commence after existing leases terminate or occupants are relocated.

I. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: <a href="[help]">[help]</a></a>

No measures are proposed because the project is compatible with existing and projected land uses and plans.

The project site is located within the Downtown Subarea, one of 14 distinctive subareas within the City of Bellevue. The Downtown Subarea is intended to be a dense, mixed-use urban center and to serve as the continued location of cultural, commercial, entertainment, residential and regional uses. More specifically, the site is located within the Downtown Subarea's Eastside Center District, one of nine districts within Downtown, with each district consisting of a distinct, mixed-use neighborhood with a unique identity.

The Eastside Center District is comprised of three smaller districts: Bellevue Square, City Center, and the Civic/Convention District. Each district is intended to be a distinct, mixed-use neighborhood with a unique identity. The Eastside Center District is within walking distance to all of Downtown's key features and ties the Downtown together from east to west along the NE 6th Street portion of the Grand Connection. The main goal of the district is to have it become the symbolic and functional heart of the Eastside Region.

The proposed project would be consistent with the City's Downtown Subarea and the Eastside Center District goals by providing increased mixed-use density (office and retail) on a site that is underutilized from a density perspective. The project would provide employment-generating uses onsite in a creative, compact, mixed use pattern that would be supportive of transit, would provide uses that would activate the Pedestrian Corridor, and would incorporate design components that ensure accessibility to the public. This is also consistent with regional goals to focus growth within urban centers. The proposed development would be consistent with the type and scale of existing and planned uses surrounding

the site within the Downtown Subarea, and is consistent with the City's Land Use Code.

Please see Appendix D for more information on the project's consistency with the City's Comprehensive Plan, as well as various design guidelines.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any: <a href="[help]">[help]</a>

No measures are proposed. The project site is located within a dense urban center and is not located in the immediate vicinity of agricultural or forest lands.

### 9. Housing [help]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [help]

The proposed project consists of office and commercial/retail space.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [help]

No housing exists on the site currently, and none would be eliminated.

c. Proposed measures to reduce or control housing impacts, if any: [help]

No housing impacts would occur and no measures are proposed.

#### 10. Aesthetics [help]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [help]

The approximate height of the office tower for Phase 2 would be roughly 446 feet above the average finished grade.

Principal building materials for the Phase 2 office tower are anticipated to be vision and spandrel glass, metal panel, concrete, and wood. Please see the ADR plans on file with the City of Bellevue for more detailed information.

b. What views in the immediate vicinity would be altered or obstructed? [help]

See Appendix A for a detailed response to this question.

c. Proposed measures to reduce or control aesthetic impacts, if any: [help]

**Project** 

Design

Review and Design

in LUC

20.25A

subject to

**Standards** 

No significant adverse aesthetic impacts are anticipated and no measures are proposed.

The proposed project is complying with applicable design guidelines, the application of which are evaluated through the ADR approval.

#### 11. Light and Glare [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [help]

Principal sources of light and glare produced by Phase 2 of the proposed project would include both stationary sources of light (e.g. interior lighting, pedestrian-level lighting, illuminated signage) and mobile sources, principally from vehicles maneuvering and operating within the site to access the parking garage. Lighting from the proposed project could be visible from locations proximate to the project site, and would mainly be visible at nighttime. Specific information relative to stationary sources, such as exterior building light fixtures, signage, façade materials (in terms of specular or reflective characteristics) and glazing would be provided as part of the construction-level plans associated with the City's Building Permit process.

Project subject to Light and Glare requirements of LUC 20.20.522

b. Could light or glare from the finished project be a safety hazard or interfere with views?
 [help]

No. Light and glare associated with the proposed project is not expected to cause a safety hazard nor interfere with views.

c. What existing off-site sources of light or glare may affect your proposal? [help]

There are no off-site sources of light or glare that would affect the proposed project.

d. Proposed measures to reduce or control light and glare impacts, if any: [help]

No significant adverse light or glare-related impacts are anticipated and no mitigation measures are proposed. The proposed project would comply with the City's guidelines on glare and lighting.

#### 12. Recreation [help]

a. What designated and informal recreational opportunities are in the immediate vicinity? [help]

Directly to the south of the project site is the Bellevue Pedestrian Corridor, which serves as the main spine for the City of Bellevue's proposed 'Grand Connection' - a proposition to connect Meydenbauer Bay to the Eastside Rail Corridor with a non-motorized pathway. Phase 2 is also adjacent to the existing bike lanes along 108th Avenue NE.

There are also two parks in the immediate vicinity of the project site (i.e. within a half mile or less), including:

- Downtown Park, located approximately 4 blocks to the southwest; and
- Bellevue Library Open Space, located approximately 2 blocks to the north.
- b. Would the proposed project displace any existing recreational uses? If so, describe. [help]

No, the proposed project would not displace any existing recreational uses.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [help]

No significant adverse recreational impacts would occur, therefore, no measures are proposed.

The new building in Phase 2 of the proposed development steps back from the Grand Connection/Pedestrian Corridor along NE 6th Street and would enliven the open spaces and streetscapes and bike lanes along both 108th Avenue NE and the Pedestrian Corridor by providing retail spaces, pathway improvements for pedestrians, landscaping and hardscape improvements, site furnishings, and other amenities. As well, a significant outdoor plaza in the middle of the block will create a landscaped pedestrian connection to the north and a place of respite for residents, commuters, and downtown workers. The project would be landscaped with the intention to enrich and enliven the pedestrian experience.

#### 13. Historic and cultural preservation [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. [help]

There are no buildings, structures, or sites located on or near the site that are listed in or eligible for listing in national, state or local preservation registers.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [help]

There are no visible landmarks, features, or other evidence of Indian or historic use or occupation on the site.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]

Potential impacts to cultural and historic resources on or near the project site were assessed by consulting the Washington State Department of Archaeology and Historic Preservation's Information System for Architectural and Archaeological Records Data (WISAARD).

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required. [help]

No significant adverse impacts are anticipated and no mitigation measures are proposed.

#### 14. Transportation [help]

 a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. [help]

A updated Trip Generation Memo (TENW, 2021) was completed for Phase 2 of this project and is available in the City's project file.

The project site is located in downtown Bellevue on the east side of 108th Ave NE north of the Grand Connection (NE 6th Street) directly north of the Bellevue Transit Center. Vehicle access for parking, loading, and service is consolidated on the north side of the site via a private access drive connecting  $110^{\rm th}$  Avenue NE to  $108^{\rm th}$  Avenue NE.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? [help]

Yes, the site is currently served by public transit. The

nearest transit stops are located at the Bellevue Transit Center, which is located directly south of the project site. The transit center provides access to many Sound Transit and King County Metro routes. Additionally, there are busstops along adjacent city streets including  $108^{\rm th}$  Avenue NE.

The new LINK Light Rail Station is currently under construction on the southeast corner of  $110^{\rm th}$  Avenue NE and NE  $6^{\rm th}$  Street and will provide transit access from Redmond to Seattle starting in 2023.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [help]

The completed project will contain approximately 1,739 parking stalls - 741 of which will be provided during Phase 2.

Phase 2 of the project would eliminate approximately 24 stalls in the surface parking area on the project site.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). [help]

Frontage improvements contained in Phase 2 include sidewalks, ADA routes, and planting that will be provided on both public and private property along the frontage of the project site. The extent of improvements will be determined in ADR permitting.

Frontage improvements will be in accordance with City requirements.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [help]

  No, the project will not occur in the immediate vicinity of water or air transportation. The new LINK Light Rail Station is located one block to the southeast of the project site across 110<sup>th</sup> Avenue NE.
- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [help]

Full buildout of the Bellevue 600 project is estimated to generate 1,248 net new weekday PM peak hour trips  $(344 \, \text{entering}, \, 904 \, \text{exiting})$ .

-Phase 2 is estimated to generate 430 net new weekday PM peak hour trips (135 entering, 295 exiting).

Peak volumes are expected to occur between 7-9 AM and 4-6 PM. Less than 3% truck traffic is assumed.

These estimates were based on the methodology in the ITE Trip Generation Manual, 10th Edition and the City of Bellevue Impact Fee Program.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe. [help]

No, the proposal would not affect or be affected by the movement of agricultural or forest products on roads or streets in the area.

h. Proposed measures to reduce or control transportation impacts, if any: [help]

The payment of transportation impact fees will be required at building permit issuance, which will help fund the City of Bellevue planned transportation improvements throughout the City. Office buildings 50,000 sq. ft. or greater are also required to implement a Transportation Management Program (TMP) consistent with City code requirements to encourage use of non-SOV modes of transportation. The goal for this TMP should be set to reduce single-occupant vehicle trips during the peak commute period to a maximum of 33% of all trips.

#### 15. Public Services [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. [help]

It is anticipated that the proposed project would generate an incremental need for increased public services due to the addition of office and retail employees and visitors associated with the site. To the extent that emergency service providers have planned for gradual increases in service demands, no significant impacts are anticipated.

b. Proposed measures to reduce or control direct impacts on public services, if any. [help]

While the increase in employees and visitors associated with the proposed project may result in incrementally greater demand for emergency services, it is anticipated that adequate service capacity is available within Downtown Bellevue to preclude the need for additional public facilities/services.

#### 16. Utilities [help]

a. Circle utilities currently available at the site: <a href="[help]">[help]</a> electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other

All utilities are currently available at the site.

The existing utilities within  $108^{\rm th}$  Avenue NE will be protected during construction and will provide connections to the proposed buildings.

- c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [help]
  - Water New, multiple domestic water connections, onsite and ROW irrigation, and fire service connections (Bellevue Utilities);
  - Stormwater New, multiple storm drain connections
     (Bellevue Utilities);
  - Sewer New, multiple side sewer connections to combined sewer System (Bellevue Utilities);
  - Electrical New electrical feed (Puget Sound Energy); and
  - Communication New communication service connections (Centurylink, Comcast, other TBD).

# C. Signature [help]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:
Name of signee:Michele Sarlitto Position and Agency/Organization: Senior Environmental Planner - EA
Engineering, Science, and Technology, Inc., PBC
Date Submitted: April 2, 2020

# APPENDIX A EXPANDED ENVIRONMENTAL CHECKLIST RESPONSES

# APPENDIX A EXTENDED ENVIRONMENTAL CHECKLIST RESPONSES

The following contains additional information to the SEPA Environmental Checklist prepared for Phase 2 of the **Bellevue 600** project

## A. BACKGROUND INFORMATION

# 10. List any government approvals or permits that will be needed for your proposal, if known.

#### City of Bellevue

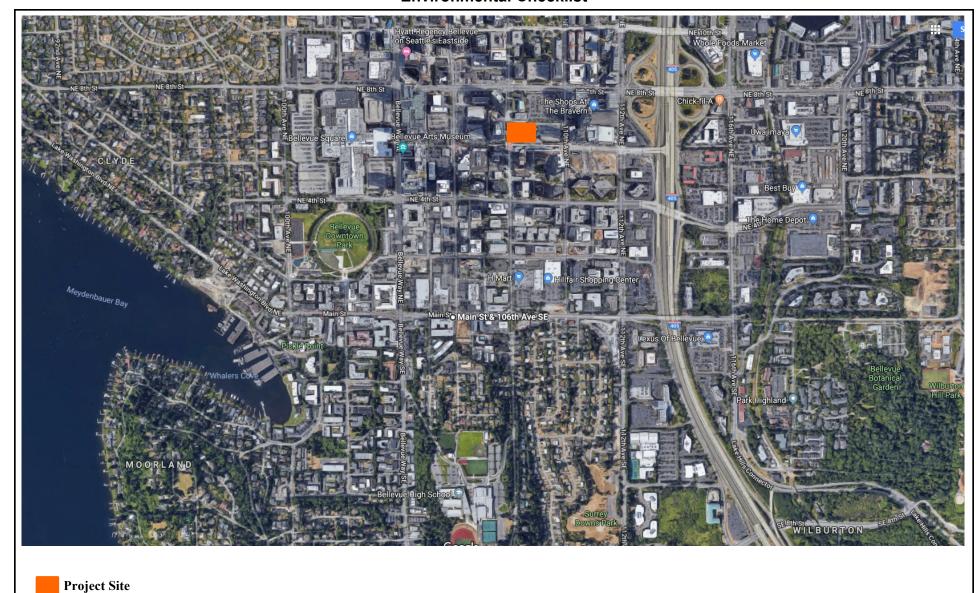
- Design Review
- Master Development Plan
- Binding Site Plan
- Demolition Permit
- Clearing and Grading Permit
- Building Permits
- Stormwater Review
- Street Use Permits (construction temporary)
- Street Improvements
- Mechanical Permits
- Plumbing Permit
- Elevator Permits
- Occupancy Permits

#### **Puget Sound Clean Air Agency**

• Demolition Permit

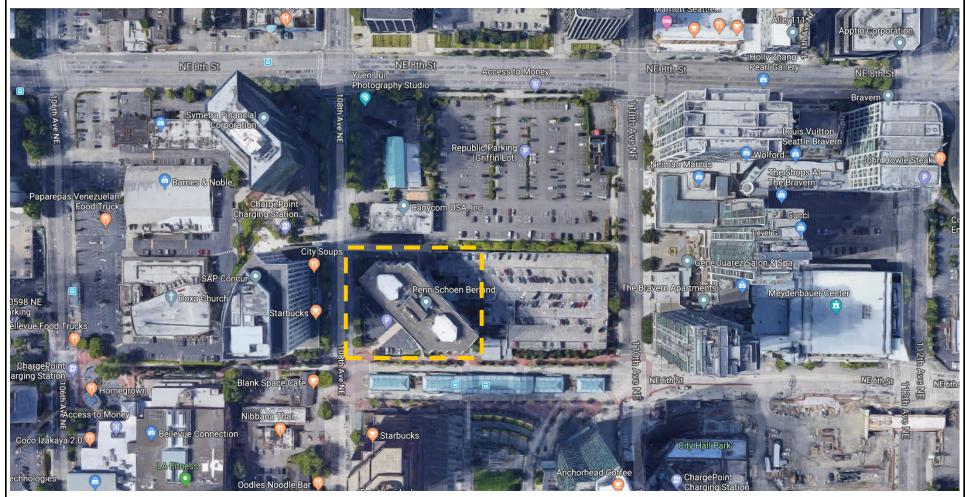
### Washington Department of Ecology

Construction General NPDES Permit



Source: EA, 2019

EA Engineering, Science, and Technology, Inc., PBC

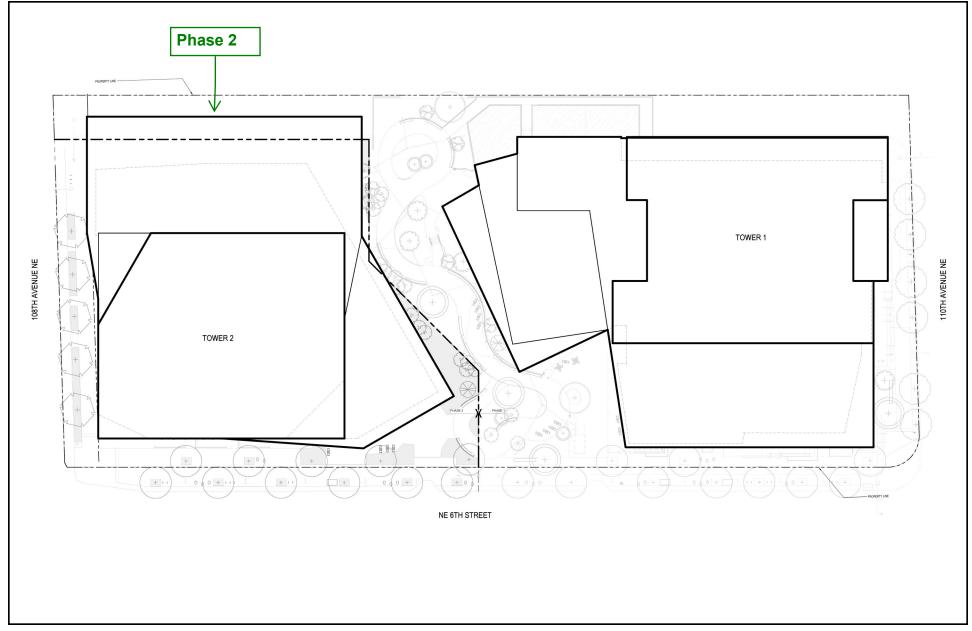




Source: EA, Google Earth, 2019



Figure 2



Source: NBBJ, 2021

EA Engineering, Science, and Technology, Inc., PBC

Figure 3







Source: NBBJ, 2021





Source: GGN, 2021

EA Engineering, Science, and Technology, Inc., PBC

Figure 5



PERSPECTIVE FROM SOUTHWEST



PERSPECTIVE FROM NORTHWEST



BUILDING PODIUM PERSPECTIVE FROM SOUTHEAST

Administrative
Design
Review
04/02/2021

Bellevue 600
Phase 2
600 108TH AVENUE NE,
BELLEVUE, WA 98004

REVISIONS			
MARK	DATE	DESCRIPTION	
SCALE		PROJECT ARCHITECT CGE	
PROJEC NUMBER		102584.00	
DATE			
SHEET NAME			

SHEET NUMBER
GI017-PH2

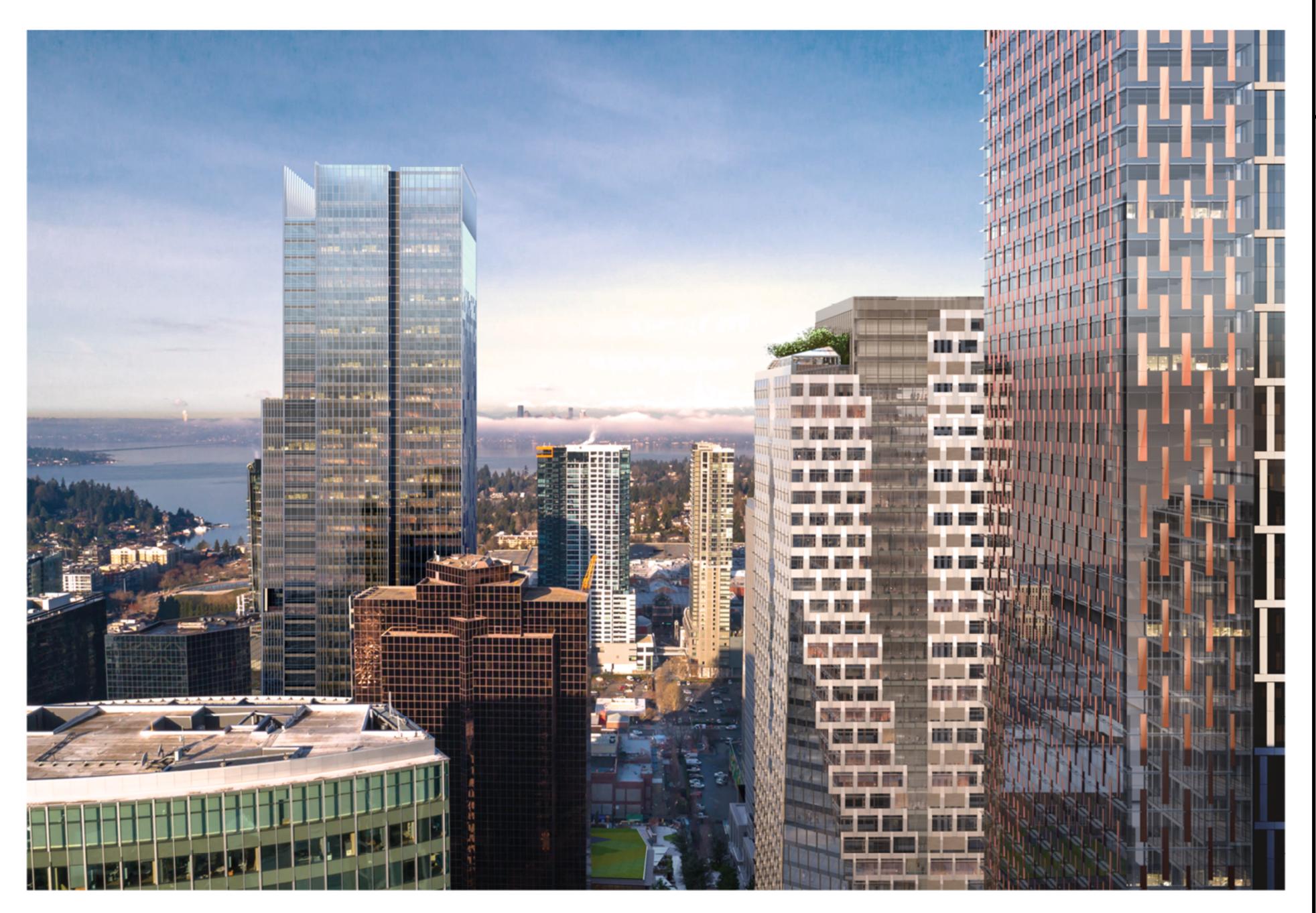
BUILDING

VIEWS

PERSPECTIVE



BUILDING BASE PERSPECTIVE FROM WEST



**BUILDING TOP FROM SOUTHEAST** 



PERSPECTIVE FROM NORTHWEST

Administrative
Design
Review
04/02/2021

Bellevue 600
Phase 2
600 108TH AVENUE NE,
BELLEVUE, WA 98004

MARK DATE DESCRIPTION

MARK DATE DESCRIPTION

PROJECT ARCHITECT CGE

PROJECT NUMBER

DATE

BUILDING PERSPECTIVE VIEWS

SHEET NUMBER
GI018-PH2